

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

MARNIE O'BRIEN,)	
)	
Plaintiff,)	
)	
v.)	
)	
MIDDLE EAST FORUM,)	
DANIEL PIPES (individually), and)	
GREGG ROMAN (individually),)	
)	
Defendants.)	
)	C.A. No. 19-06078 JMG
GREGG ROMAN,)	
)	
Counterclaim Plaintiff,)	
)	
v.)	
)	
MARNIE O'BRIEN,)	
)	
Counterclaim Defendant,)	

**STIPULATION AND [PROPOSED] ORDER OF PARTIAL DISMISSAL
OF COUNTS I AND III OF THE COUNTERCLAIM**

Counterclaim Plaintiff Gregg Roman and Counterclaim Defendant Marnie O'Brien,
subject to the approval of the Court, hereby stipulate and agree to the following:

1. In accordance with Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Count I (Tortious Interference) and Count III (Civil Conspiracy) of the Counterclaim shall be dismissed without prejudice.
2. Counterclaim Count II (Abuse of Process) is not dismissed and remains asserted against Counterclaim Defendant O'Brien.

CLARK HILL PLC

/s/ Kevin Levine

Kevin Levine, Esq. (PA Bar No. 326492)
Two Commerce Square
2001 Market Street, Ste. 2620
Philadelphia, PA 19103
P: (215) 640-8524
Klevine@clarkhill.com

~of counsel~

Margaret M. DiBianca, Esq. (DE No. 4539)
CLARK HILL PLC
824 N. Market Street, Ste. 710
Admitted Pro Hac Vice
Wilmington, DE 19801
P: (302) 250-4748
mdibianca@clarkhill.com

Attorneys for Counterclaim Plaintiff

Dated: January 22, 2021

DEREK SMITH LAW GROUP, PLLC

/s/ Erica A. Shikunov

Erica A. Shikunov, Esq. (PA No. 316841)
1835 Market Street, Suite 2950
Philadelphia, PA 19103
P: (215) 391-4790
erica@dereksmithlaw.com

Attorney for Counterclaim Defendant

Dated: January 22, 2021

SO ORDERED, this ____ day of _____, 2021.

The Honorable John M. Gallagher